

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

UNITED STATES OF AMERICA	:	
	:	
Plaintiff,	:	CASE: 1:19-CR-081
	:	
vs.	:	
	:	JUDGE MATTHEW McFARLAND
DEVONNA MILLER-WEST,	:	
	:	
Defendant.	:	

DEFENDANT'S MOTION TO TRAVEL

Now comes the Defendant Devonna Miller-West, by and through her attorney, Bradley Davis Barbin and respectfully requests this Honorable Court permit the Defendant to travel freely within the continental United States.

A memorandum in support follows.

MEMORANDUM IN SUPPORT

1. The Defendant, Devonna Miller-West has been limited to travel only between her home and where she was charged, (in another state) for the past 30 months.
2. Since July 2019, the Defendant has been subjected to unnecessary drug testing, for which she had to travel an hour, sometimes in inclement weather. All results were negative. She has no history of illegal drug use.
3. The Defendant responded weekly to pretrial requests without fail.

4. The Defendant's current conditions of bond are onerous and have precluded travel to attend to multiple family events, including a funeral.
5. Defendant's mother and father (who live next door to the Defendant) have become increasingly infirm and require the Defendant's constant care. Permission is respectfully requested to transport them to appointments which are throughout the region. It is likely that this care will require transporting her parents outside of the Southern District of West Virginia (Morgantown), Northern District of West Virginia, Pittsburgh (Western District of Pennsylvania), and/or Charlottesville, Virginia (Western District of Virginia).
6. Recently, a member of the Defendant's family (sibling) has taken ill with COVID. The Defendant would like to travel, without restriction, to assist in North Carolina.
7. The Defendant's immediate family intends to travel to Florida this holiday season and Defendant would like to travel with her husband and children on this family trip.
8. The Defendant has had no hand in delaying this trial. The Defendant has been working diligently with legal counsel to prepare for trial and the opportunity to defend her innocence. Since September of 2019, before U.S. District Judge Susan Dlott, the Defendant has been moving for an early trial with or without her co-defendants. Defendant presents no risk of missing her day in court.
9. Given the most recent continuance/vacation of the trial date, it is in the best interests of justice to permit the Defendant to travel freely within the continental United States.
10. The Government has no objection to this Motion to Travel freely within the continental United States.

WHEREFORE, the Defendant respectfully requests this Honorable Court to authorize that the conditions of her release on bond permit travel freely within the continental United States.

Respectfully submitted,

____/S/ Bradley Davis Barbin____

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing *Defendant's Motion to Travel* was served on all parties, by virtue of filing through the CM/ECF electronic case filing system of the U.S. Courts, this 21st day of December, 2021.

_____/S/_____

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